

PLAINTIFF NATASHA TAGAI

Claim One – 18 U.S.C. § 1591(a) (Plaintiff Natasha Tagai against both Defendants)

1. Did the Defendant, in at least one instance engage in sex trafficking by use of force, fraud, or coercion against Plaintiff Tagai in violation of 18 U.S.C. § 1591(a)?
(check one for each Defendant)

Rubin: ☒ YES ☐ NO
Powers: ☐ YES ☒ NO

If the answer to either part of question 1 is YES move on to question 2.

If the answer for both Defendants was NO, move on to Claim Two for Plaintiff Tagai.

2. Is Plaintiff Tagai entitled to compensatory damages for this Claim?

☒ YES ☐ NO

COMPENSATORY DAMAGES FOR THIS CLAIM = \$ 500,000

Move on to Claim Two for Plaintiff Tagai.

Claim Two – Assault (Plaintiff Tagai against Defendant Rubin)

1. Did Defendant Howard Rubin assault Plaintiff Tagai on June 12, 2017?
(check one)

☐ YES ☒ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

Move on to Claim Three for Plaintiff Tagai.

Claim Three—Battery (Plaintiff Tagai against Defendant Rubin)

1. Did Defendant Howard Rubin commit a battery against Plaintiff Tagai on June 12, 2017?
(check one)

☐ YES ☒ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

Move on to Claim Four for Plaintiff Tagai.

Claim Four—False Imprisonment (Plaintiff Tagai against Defendant Rubin)

1. Did Defendant Howard Rubin falsely imprison Plaintiff Tagai on June 12, 2017?
(check one)

☐ YES

☒ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

If the answer to Claims Two through Four was “NO”, move on to the Claim for the next Plaintiff.

Compensatory Damages

What are the compensatory damages to which Plaintiff Tagai is entitled for assault, battery, and false imprisonment?

(Please remember, plaintiff cannot recover twice for the same damage – even if the events that caused that damage might make defendant liable for two, or more, claims. The goal is to place plaintiff in the position she was in prior to the incident that made defendant liable.)

COMPENSATORY DAMAGES FOR CLAIMS TWO TO FOUR = \$ _____

Move on to the Claim for the next Plaintiff.

PLAINTIFF BRITTANY REYES

Claim One – 18 U.S.C. § 1591(a) (Plaintiff Brittany Reyes against both Defendants)

1. Did the Defendant, in at least one instance engage in sex trafficking by use of force, fraud, or coercion against Plaintiff Reyes in violation of 18 U.S.C. § 1591(a)?
(check one for each Defendant)

Rubin: ☒ YES ☐ NO

Powers: ☐ YES ☒ NO

If the answer to either part of question 1 is YES move on to question 2.

If the answer for both Defendants was NO, move on to the Claim for the next Plaintiff.

2. Is Plaintiff Reyes entitled to compensatory damages for this Claim?

☒ YES ☐ NO

TOTAL COMPENSATORY DAMAGES = \$ 500,000

Move on to the Claim for the next Plaintiff.

PLAINTIFF BRITTANY HASSEN

Claim One – 18 U.S.C. § 1591(a) (Plaintiff Brittany Hassen against Defendant Rubin)

1. Did the Defendant, in at least one instance engage in sex trafficking by use of force, fraud, or coercion against Plaintiff Hassen in violation of 18 U.S.C. § 1591(a)?
(check one)

Rubin: ☒ YES ☐ NO

If the answer to question 1 is YES move on to question 2.

If the answer was NO, move on to the Claim for the next Plaintiff.

2. Is Plaintiff Hassen entitled to compensatory damages for this Claim?

☒ YES ☐ NO

TOTAL COMPENSATORY DAMAGES = \$ 500,000

Move on to the Claim for the next Plaintiff.

PLAINTIFF EMMA HOPPER

Claim One – 18 U.S.C. § 1591(a) (Plaintiff Emma Hopper against both Defendants)

1. Did the Defendant, in at least one instance engage in sex trafficking by use of force, fraud, or coercion against Plaintiff Hopper in violation of 18 U.S.C. § 1591(a)?
(check one for each Defendant)

Rubin: ☒ YES ☐ NO

Powers: ☐ YES ☒ NO

If the answer to either part of question 1 is YES move on to question 2.

If the answer for both Defendants was NO, move on to Claim Two for Plaintiff Hopper.

2. Is Plaintiff Hopper entitled to compensatory damages for this claim?

☒ YES ☐ NO

TOTAL COMPENSATORY DAMAGES = \$ 500,000

Move on to the Claim for the next Plaintiff.

PLAINTIFF MIA LYTELL

Claim One – 18 U.S.C. § 1591(a) (Plaintiff Mia Lytell against both Defendants)

1. Did the Defendant, in at least one instance engage in sex trafficking by use of force, fraud, or coercion against Plaintiff Lytell in violation of 18 U.S.C. § 1591(a)?
(check one for each Defendant)

Rubin: ☒ YES ☐ NO
Powers: ☐ YES ☒ NO

If the answer to either part of question 1 is YES move on to question 2.

If the answer for both Defendants was NO, move on to the Claim for the next Plaintiff.

2. Is Plaintiff Lytell entitled to compensatory damages for this claim?

☒ YES ☐ NO

TOTAL COMPENSATORY DAMAGES = \$500,000

Move on to the Claim for the next Plaintiff.

PLAINTIFF AMY MOORE

Claim One – 18 U.S.C. § 1591(a) (Plaintiff Amy Moore against both Defendants)

1. Did the Defendant, in at least one instance engage in sex trafficking by use of force, fraud, or coercion against Plaintiff Moore in violation of 18 U.S.C. § 1591(a)?
(check one for each Defendant)

Rubin: ☒ YES ☐ NO
Powers: ☐ YES ☒ NO

If the answer to either part of question 1 is YES move on to question 2.

If the answer for both Defendants was NO, move on to Claim Two for Plaintiff Moore.

2. Is Plaintiff Moore entitled to compensatory damages?

☒ YES ☐ NO

COMPENSATORY DAMAGES FOR THIS CLAIM = \$ 500,000

Move on to Claim Two for Plaintiff Moore.

Claim Two – Assault (Plaintiff Moore against Defendant Rubin)

1. Did Defendant Howard Rubin assault Plaintiff Moore in December 2016?
(check one)

☐ YES ☒ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

Move on to Claim Three for Plaintiff Moore.

Claim Three—Battery (Plaintiff Moore against Defendant Rubin)

1. Did Defendant Howard Rubin commit a battery against Plaintiff Moore in December 2016?
(check one)

☒ YES ☐ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

Move on to Claim Four for Plaintiff More.

Claim Four—False Imprisonment (Plaintiff Moore against Defendant Rubin)

1. Did Defendant Howard Rubin falsely imprison Plaintiff Moore in December 2016?
(check one)

☐ YES

☒ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

Move on to Claim Five for Plaintiff Moore.

Claim Five—Intentional Infliction of Emotional Distress (Plaintiff Moore against Defendant Rubin)

1. Did Defendant intentionally inflict emotional distress against Plaintiff Moore in December 2016?
(check one)

☐ YES

☒ NO

If the answer to question 1 is YES you MUST answer the “Compensatory Damages” question at the end of this section.

If the answer to Claims Two through Five was “NO”, do not answer the “Compensatory Damages” question below.

Compensatory Damages

What are the compensatory damages to which Plaintiff Moore is entitled for assault, battery, false imprisonment, and intentional infliction of emotional distress?

(Please remember, plaintiff cannot recover twice for the same damages – even if the events that caused that damages might make defendant liable for two, or more, claims. The goal is to place plaintiff in the position she was in prior to the incident that made defendant liable.)

COMPENSATORY DAMAGES FOR CLAIMS TWO TO FIVE = \$ —0—